

**THOMAS A. MARSHALL**  
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2008-00250

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July 3, 2008

**RECEIVED**

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**PUBLIC SERVICE  
COMMISSION**

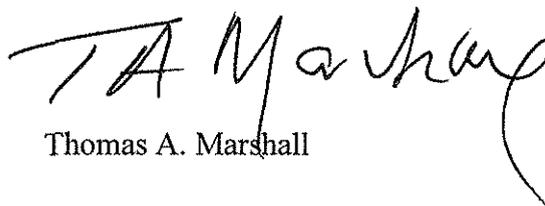
Ms. Stephanie Stumbo  
Executive Director  
Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

Re: Motions for Intervention by Elkhorn and Peaks Mill Water Districts  
Frankfort Plant Board's Wholesale Water Adjustment

Dear Ms. Stumbo:

Elkhorn and Peaks Mill Water Districts hereby file and present their Motions for Intervention in the matter of the wholesale water adjustment as filed by the Frankfort Electric and Water Plant Board on or about June 6, 2008. If there are any questions, please contact me at 223-4723 or [tamarshall@mac.com](mailto:tamarshall@mac.com).

Sincerely,

  
Thomas A. Marshall

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

**In the Matter of:**

**PROPOSED ADJUSTMENT OF THE WHOLESALE )  
WATER SERVICE RATES OF THE FRANKFORT ) CASE NO. 2008-00250  
ELECTRIC AND WATER PLANT BOARD )**

**Motion for Full Intervention by Peaks Mill Water District**

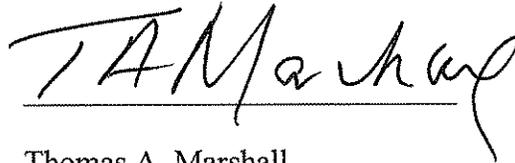
Comes the Peaks Mill Water District ("Peaks Mill"), by counsel, and hereby tenders this motion requesting that Peaks Mill be granted full intervention in regards to the Frankfort Electric and Water Plant Board's ("Frankfort Plant Board") request for a rate increase, approximately 18.39 percent, as evidenced by a proposed tariff filed on or about June 6, 2008, and to be effective on July 7, 2008.

For its grounds for intervention, Peaks Mill states that it is located in Franklin County, Kentucky, and is subject to regulation by the Kentucky Public Service Commission. Peaks Mill is a wholesale customer of the Frankfort Plant Board, and believes that it is in the best interest of Peaks Mill's customers that the Commission review and investigate the proposed increase(s) in regards to reasonableness and the adequacy of the justification.

Peaks Mill requests that the Commission carefully review any cost of service study or other justification that is provided in support of the rates, and that the Commission consider any other issue or matter related to the wholesale rates that would

assist in determining their reasonableness. In conclusion, it is requested that the rates proposed by the Frankfort Plant Board be suspended during Commission review.

Respectfully submitted,



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Counsel for Peaks Mill Water District

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing MOTION has been sent by first-class mail, postage prepaid, on this date, July 3, 2008, to the following:

Warner J. Caines  
General Manager  
Frankfort Plant Board  
317 W. Second Street  
P.O. Box 308  
Frankfort, KY 40602

Donald T. Prather  
500 Main Street, Suite 5  
Shelbyville, KY 40065  
Attorney for North Shelby  
Water Company and U.S. 60  
Water District

Hance Price, Esq.  
Counsel, Frankfort Plant Board  
317 W. Second Street  
P.O. Box 308  
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